

Auditing Procedures Report

Issued under Public Act 2 of 1968, as amended.

Unit Name	BENTON TWP HOUSING COM	County	BERRIEN	Type	TOWNSHIP	MuniCode	11-7-521
Opinion Date	May 21, 2008	Audit Submitted	Jun 21, 2008	Fiscal Year	2007		

If a local unit of government (authorities & commissions included) is operating within the boundaries of the audited entity and is NOT included in this or any other audit report, nor do they obtain a stand-alone audit, enclose the name(s), address(es), and a description(s) of the authority and/or commission.

Place a check next to each "Yes" or non-applicable question below. Questions left unmarked should be those you wish to answer "No".

<input checked="" type="checkbox"/>	1. Are all required component units/funds/agencies of the local unit included in the financial statements and/or disclosed in the reporting entity notes to the financial statements?
<input checked="" type="checkbox"/>	2. Does the local unit have a positive fund balance in all of its unreserved fund balances/unrestricted net assets?
<input checked="" type="checkbox"/>	3. Were the local unit's actual expenditures within the amounts authorized in the budget?
<input type="checkbox"/>	4. Is this unit in compliance with the Uniform Chart of Accounts issued by the Department of Treasury?
<input checked="" type="checkbox"/>	5. Did the local unit adopt a budget for all required funds?
<input checked="" type="checkbox"/>	6. Was a public hearing on the budget held in accordance with State statute?
<input checked="" type="checkbox"/>	7. Is the local unit in compliance with the Revised Municipal Finance Act, an order issued under the Emergency Municipal Loan Act, and other guidance as issued by the Local Audit and Finance Division?
<input type="checkbox"/>	8. Has the local unit distributed tax revenues, that were collected for another taxing unit, timely as required by the general property tax act?
<input checked="" type="checkbox"/>	9. Do all deposits/investments comply with statutory requirements including the adoption of an investment policy?
<input checked="" type="checkbox"/>	10. Is the local unit free of illegal or unauthorized expenditures that came to your attention as defined in the Bulletin for Audits of Local Units of Government in Michigan, as revised (see Appendix H of Bulletin.)
<input checked="" type="checkbox"/>	11. Is the unit free of any indications of fraud or illegal acts that came to your attention during the course of audit that have not been previously communicated to the Local Audit and Finance Division? (If there is such activity, please submit a separate report under separate cover.)
<input checked="" type="checkbox"/>	12. Is the local unit free of repeated reported deficiencies from previous years?
<input checked="" type="checkbox"/>	13. Is the audit opinion unqualified?
	14. If not, what type of opinion is it? <input type="text" value="NA"/>
<input checked="" type="checkbox"/>	15. Has the local unit complied with GASB 34 and other generally accepted accounting principles (GAAP)?
<input checked="" type="checkbox"/>	16. Has the board or council approved all disbursements prior to payment as required by charter or statute?
<input type="checkbox"/>	17. To your knowledge, were the bank reconciliations that were reviewed performed timely?
<input checked="" type="checkbox"/>	18. Are there reported deficiencies?
<input checked="" type="checkbox"/>	19. If so, was it attached to the audit report?

General Fund Revenue:	\$ 2,369,403.00
General Fund Expenditure:	\$ 2,635,345.00
Major Fund Deficit Amount:	\$ 0.00

General Fund Balance:	\$ 6,168,363.00
Governmental Activities Long-Term Debt (see instructions):	\$ 0.00

We affirm that we are certified public accountants (CPA) licensed to practice in Michigan. We further affirm the above responses have been disclosed in the financial statements, including the notes, or in the Management Letter (Reported deviations)

CPA (First Name)	JOHN	Last Name	DIPIERO	Ten Digit License Number	1101011469
CPA Street Address	397 SANDRIDGE DRIVE	City	HEMLOCK	State	MI
				Zip Code	48626
CPA Firm Name	JOHN C DIPIERO, CPA, PC	Unit's Street Address	1218 BLOSSOM LANE	City	BENTON HARBOR
				Zip Code	49022

BENTON TWP HOUSING COMMISSION

Financial Statements

September 30, 2007

Audited by

JOHN C. DIPIERO, P.C.

Certified Public Accountant

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BENTON TOWNSHIP HOUSING COMMISSION
1216 Blossom Lane
Benton Harbor, MI 49022

Sharon Hester, Executive Director

As management of the Benton Township Housing Commission we offer reviewers of this audit report this narrative discussion and analysis of the Benton Township Housing Commission's financial activities for the FYE 9/30/07. This discussion and analysis letter of the Benton Township Housing Commission's financial performance should be read in conjunction with the auditor's opinion letter and the following Financial Statements.

The combined financial statements reflect all of the Commission's federally funded programs and activities in one place. The Commission reports all its activities and programs using the Enterprise Fund type model. HUD encourages PHAs to use this accounting method as it is normally used to account for "business-type activities" - activities similar to those found in the private sector. Enterprise Fund types use the accrual method of accounting, the same accounting method employed by most private-sector businesses. Under this method, revenues and expenditures may be reported as such even though no cash transaction has actually taken place.

Overview of the Financial Statements

This annual report contains this *Management & Discussion Analysis* report, the *Basic Financial Statements* and the *Notes to the Financial Statements*. This report also contains the Financial Data Schedule (FDS) as referenced in the section of *Supplemental Information*. The Commission's financial statements are presented as fund financial statements because the Commission only has proprietary funds.

Required Financial Statements

The Statement of Net Assets includes the Commission's assets and liabilities and provides information about the nature and amounts of investments in resources (assets) and obligations of the Commission creditors (liabilities).

It also provides the basis for evaluating the liquidity and financial flexibility of the Commission.

All of the current year's revenues and expenses are accounted for in the Statement of Revenues, Expenses, and Changes in Net Assets. This statement measures the success of the Commission's operations over the past year and can be used to determine whether the Commission has successfully recovered all its costs through its user fees and other charges, profitability and credit worthiness.

The final required financial statement is the Statement of Cash Flows. The statement reports cash receipts, cash payments, and net changes in cash resulting from operations, investing and financing activities and provides answers to such questions as where did cash come from, what was cash used for, and what was the change in the cash balance during the reporting period.

Management Discussion & Analysis- continued

Notes to the Financial Statements

The notes provide additional information that is essential to a full understanding of the data provided in the basic financial statements and provide more detailed data.

Supplemental Information

This report also contains the Financial Data Schedule (FDS) as referenced in the section of *Supplemental Information*. HUD has established Uniform Financial Reporting Standards that require Housing Commissions to submit financial information electronically to HUD using the FDS format. This financial information was electronically transmitted to the Real Estate Assessment Center (REAC) and is required to be included in the audit reporting package.

The Financial Data Schedule reports the Commission's operations in more detail. The Commission reports all its activities using Enterprise fund types. These funds are used to show activities that operate more like commercial enterprises. The Financial Data Schedule is organized by the government Catalogue of Financial Domestic Assistance (CFDA) numbers.

Benton Township Housing Commission Programs:

Low Rent Public Housing: Under this program, the Housing Commission rents units that it owns to low-income elderly and family households. This program is operated under an Annual Contributions Contract with HUD. HUD provides Operating Subsidies to enable the Housing Commission to lease these units at a rate that is based on 30% of the household income.

Capital Fund Program: Under this program, the Housing Commission is awarded funds each year to use for Capital Needs. The Housing Commission also has the ability to use up to 20% of these funds, if need be, to supplement Operating Subsidies. This program is the primary funding source for physical improvements to its properties.

Section 8 Housing Choice Voucher Program: Under this program, the Housing Commission administers contracts with independent landlords to provide housing for low-income households. These units are not owned by the Housing Commission. The Housing Commission subsidizes the family's rent via a "Housing Assistance Payment" made directly to the landlord. HUD provides subsidy to the Housing Commission to enable the Housing Commission to set the rental rates at 30% of a participant's income.

Management Discussion & Analysis- continued

Entity-Wide Financial Highlights:

The following Federal Assistance was received during FYE 9/30/07:

	<u>FYE</u> <u>9/30/07</u>	<u>FYE</u> <u>9/30/06</u>	<u>Dollar</u> <u>Change</u>	<u>Per</u> <u>Cent</u> <u>Change</u>
Public Housing Operating Subsidy	815,762	790,053	25,709	3.25%
Capital Fund Program Grants	415,509	510,622	(95,113)	-18.63%
Sec. 8 Voucher	<u>403,569</u>	<u>297,072</u>	<u>106,497</u>	<u>35.85%</u>
Total	1,634,840	1,597,747	37,093	2.32%

The subsidy for Public Housing increased only slightly, reflecting inflationary factors in the Operating fund formula.

The decrease in Capital Fund Grants was due to the fact that our work projects moved along at a slower pace than in the previous year.

The subsidy for Sec. 8 increased due to increases in HAP costs.

The following represents changes in the Balance Sheet:

	<u>FYE</u> <u>9/30/07</u>	<u>FYE</u> <u>9/30/06</u>	<u>Dollar</u> <u>Change</u>	<u>Per</u> <u>Cent</u> <u>Change</u>
Cash & Investments	668,724	783,822	(115,098)	-14.68%
Total Current Assets	1,104,277	955,588	148,689	15.56%
Fixed Assets, Net of Depreciation	5,226,996	5,614,557	(387,561)	-6.90%
Total Assets	6,331,273	6,570,145	(238,872)	-3.64%
Total Current Liabilities	162,910	137,184	25,726	18.75%
Total Long-Term Liabilities	0	12,101	(12,101)	100.00%
Total Liabilities	162,910	149,285	13,625	9.13%
Total Equity/Net Assets	6,168,363	6,420,860	(252,497)	-3.93%

1. Cash and Investments decreased by over \$100,000. This is primarily due to the fact that as of 9/30/07 we had substantial receivables from HUD on both our Capital Fund Programs and Public Housing Operating Subsidy for a total Receivable of \$309,540, compared to only \$54,146 last year. Because we were late in requisitioning funds due us from HUD, our cash balances were low as compared to the balances as of 9/30/06. If HUD Accounts Receivable had been collected as of 9/30/07, cash and investments would have increased over the 9/30/06 levels commensurate with the income generated by the Public Housing program for FYE 9/30/07 and the increase in Sec. 8 Voucher equity positions.

Management Discussion & Analysis- continued

2. Total current Assets increased by \$148,689, representing the Operating Income generated by the Public Housing Program (\$57,473) plus the increase in Sec. 8 cash due to the way Sec. 8 is funded now. We received approximately \$80,000 more in HAP subsidy than we utilized in the current year, thus increasing our cash balance.
3. Fixed Assets increased by \$307,381; this increase represents several capital projects funded through the Capital Fund Programs (see details later in this report). Although Fixed Assets increased by \$307,381, this was more than offset by depreciation charges of \$689,810 and also equipment disposition charges, resulting in the net decrease stated in the above table.
4. Total Assets overall decreased by \$238,872 for the various reasons stated above.
5. Current Liabilities increased by \$25,726, primarily due to the fact that the Utility Companies were late in billing us at 9/30/07, resulting in a larger entry to utilities payable than at 9/30/06.
6. Long-Term liabilities decreased down to zero. The Commission changed policy as regards to compensated Absences to a Use It or Lose It policy, thus eliminating any liability as of 9/30/07 or in the future.
7. Total Liabilities increased a total of \$13,625 for the reasons stated above.
8. Total Equity/Net Assets decreased by \$252,497. Total Net Assets is comprised of two components: Invested in Capital Assets, which mirrors the decrease in Fixed Assets, Net of Depreciation as explained above. The other component is Unrestricted Net Assets, or what used to be called Operating Reserves. This figure increased due to the Operating Income generated by the Public Housing Program for FYE 9/30/07. There was also a substantial increase in the Equity section for Section 8 due to the HUD-issued accounting changes in the Section 8 Housing Choice Voucher program (PIH Notice #2006-3).

The following schedule compares the Revenues and Expenses for the current and prior fiscal years:

Statement of Revenues, Expenses, and Changes in Net Assets

	<u>FYE</u> <u>9/30/07</u>	<u>FYE</u> <u>9/30/06</u>	<u>Dollar</u> <u>Change</u>	<u>Per</u> <u>Cent</u> <u>Change</u>
Revenues :				
Tenant Revenue	698,934	677,522	21,412	3.2%
Other Revenue	35,629	32,097	3,532	11.0%
Total PHA generated Revenue	734,563	709,619	24,944	3.5%
Operating Subsidies/Soft Cost Grant Revenue	1,338,722	1,148,560	190,162	16.6%
Capital Grants (Hard costs)	296,118	449,187	(153,069)	-34.1%
Total Revenue	2,369,403	2,307,366	62,037	2.7%

Management Discussion & Analysis- continued

Expenses:				
Administrative	545,243	534,356	10,887	2.0%
Tenant Services	11,115	11,375	(260)	-2.3%
Utilities	351,564	347,083	4,481	1.3%
Maintenance	620,494	553,123	67,371	12.2%
General	127,397	149,376	(21,979)	-14.7%
Extraordinary Maintenance		2,480	(2,480)	-100.0%
Casualty Losses	(2,205)	2,650	(4,855)	-183.2%
Housing Assistance Payments	291,927	243,524	48,403	19.9%
Depreciation	689,810	679,486	10,324	1.5%
Total Expenses	2,635,345	2,523,453	98,447	4.4%
Net Increase (Decrease)	(265,942)	(216,087)		

Revenues:

Benton Township Housing Commission's primary revenue sources are subsidies and grants received by HUD. Revenue received from HUD in FYE 9/30/07 for Public Housing and for Sec. 8 remained relatively flat from FYE 9/30/06 to 9/30/07. For FYE 9/30/07, revenue generated by the Commission accounted for \$734,563 (or 31% of total revenue), while HUD contributions accounted for \$1,634,840 (or 69% of total revenue). Investment Income increased due to rising interest rates.

Expenses:

Total Expenses for FYE 9/30/07 were \$2,635,345 while for FYE 9/30/06 the total was \$2,523,453. This represents just a 4.4% increase in our Operating Costs, an amount that can be substantially attributed to inflation. The cost areas that increased the most were:

	<u>FYE</u> <u>9/30/07</u>	<u>FYE</u> <u>9/30/06</u>	<u>Dollar</u> <u>Change</u>	<u>Per</u> <u>Cent</u> <u>Change</u>
Maintenance Labor Wages	204,414	194,126	10,288	5.3%
Maintenance Contract costs	245,178	206,023	39,155	19.0%
Maintenance Employee Benefits	93,929	75,865	18,064	23.8%
Housing Assistance Payments	291,927	243,524	48,403	19.9%

1. Labor Wages increased due to both rate increases and additional overtime.
2. Contract costs increased due to an increase in unit turnovers. We contract out most of our turnover costs.

Management Discussion & Analysis- continued

3. Maintenance Employee Benefits increased primarily due to increased health care costs.

4. Housing Assistance Payments increased due to both inflationary increases in rents charged by landlords and also to increased lease-up.

In addition to the above increases, General Expenses decreased overall primarily due to a decrease in our property and liability insurance premiums.

Budget Analysis:

A Low Rent Public Housing Operating Budget for FYE 9/30/07 was presented to and approved by the Board of Commissioners. We had no reason to amend the budget during the fiscal year. Actual results were in line with budgeted amounts.

Entity-Wide Operational Highlights:

The Benton Township Housing Commission provided the following housing for low- income elderly and low-income families:

	FYE 9/30/07	FYE 9/30/06
Public Housing	300	300
Sec. 8 Voucher	75	75

During FYE 9/30/07, Benton Township Housing Commission maintained a lease-up rate of 97.4 in its Public Housing Program and a lease-up rate of 98.3% in its Section 8 program. These lease-up rates are in excess of HUD guidelines.

During FYE 9/30/07, our Capital Fund Program work projects included:

1. Upgrades to our fire alarm and nurse call systems in all units.
2. Upgrades at our senior complex of interior lighting, bathtub fixtures, emergency strobe lighting, and new appliances
3. Upgrades at our family units of appliances, replacement of exterior doors, interior lighting, and security storm doors.
4. We also completed landscaping upgrades throughout the project.

Management Discussion & Analysis- continued

Economic Factors and Next Year's Budget and Rates

The Housing Commission is primarily dependent upon HUD for the funding of operations as well as capital needs. Therefore, the Housing Commission is affected more by the Federal Budget than by local economic conditions. The funding of programs could be significantly affected by the Federal Budget.

A fundamental finding of the Harvard Cost Study is that Public Housing Agencies have been, and continue to be, woefully underfunded by HUD. Yet, due to the federal budget crunch, HUD continues to only pay us only a portion of the subsidy that we are entitled to. Since we fully expect this inadequate funding pattern to continue it is inevitable that cuts in services to our residents will have to be made.

Although the Housing Commission remains concerned about the future levels of HUD funding due to the state of the federal budget, we feel that, in the short term, we are both financially and operationally in a strong position to continue to provide safe, sanitary, and decent housing to our residents.

Request for Information

This financial report is designed to provide a general overview of the Commission's finances for all those with an interest in its finances. Questions or comments concerning any of the information contained in this report or request for additional information should be directed to:

Sharon Hester, Executive Director
Benton Township Housing Commission
1216 Blossom Lane
Benton Harbor, MI 49022

John C. DiPiero, P.C.

Certified Public Accountant

P. O. Box 378
Hemlock, Michigan 48626
Tel / Fax (988) 642-2092

Board of Commissioners
Benton Township Housing Commission
1216 Blossom Lane
Benton Harbor, Michigan 49022

Independent Auditor's Report

I have audited the financial statements of the Benton Township Housing Commission's Business Type Activities as of and for the year ended September 30, 2007. These financial statements are the responsibility of the Housing Commission's management. My responsibility is to express an opinion on the financial statements based on my audit.

I conducted my audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that I plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. I believe that my audit provides a reasonable basis for my opinion.

In my opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Benton Township Housing Commission as of September 30, 2007, and the results of its operations and the cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, I have also issued my report dated May 21, 2008, on my consideration of the Benton Township Housing Commission's internal control over financial reporting and on my tests of its compliance with certain provisions of laws, regulations, contracts, and grants.

My audit was conducted for the purpose of forming an opinion on the financial statements taken as a whole. The accompanying Financial Data Schedule is presented for purposes of additional analysis and is not a required part of the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in my opinion, if fairly stated in all material respects in relation to the financial statements taken as whole.

The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by U. S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and is not a required part of the financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and, in my opinion, is fairly stated, in all material respects, in relation to the financial statements taken as a whole.

Certified Public Accountant

May 21, 2008

BENTON TWP HOUSING COMMISSION
Statement of Net Assets
September 30, 2007

ASSETS

C-3027

CURRENT ASSETS

Cash	\$	338,740	
Accounts Receivable (Net)		365,255	
Investments		329,984	
Prepaid Expenses		<u>70,298</u>	
Total Current Assets			\$ 1,104,277

NON CURRENT ASSETS

Land	\$	250,681	
Buildings		5,024,388	
Building Improvements		8,156,577	
Furniture, Equipment- Dwellings		249,334	
Furniture, Equipment- Administrative		322,288	
Construction in Progress		59,193	
Accumulated Depreciation		<u>(8,835,465)</u>	
Total Non Current Assets			<u>5,226,996</u>

TOTAL ASSETS \$ 6,331,273

BENTON TWP HOUSING COMMISSION
Statement of Net Assets
September 30, 2007

LIABILITIES & NET ASSETS

C-3027

LIABILITIES:

CURRENT LIABILITIES

Accounts Payable	\$	22,935	
Accrued Liabilities		43,950	
Tenants Security Deposit		64,106	
Accounts Payable- Other Governments		29,567	
Deferred Revenue		<u>2,352</u>	
<u>Total Current Liabilities</u>	\$		162,910

NET ASSETS:

Investment in Fixed Assets net of Related Debt	\$	5,226,996	
Unrestricted Net Assets		<u>941,367</u>	
<u>Total Net Assets</u>			<u>6,168,363</u>
<u>TOTAL LIABILITIES & NET ASSETS</u>	\$		<u>6,331,273</u>

The Accompanying Footnotes are an Integral Part of the Financial Statements

BENTON TWP HOUSING COMMISSION
Statement of Revenue, Expenses, and Changes in Net Assets
For the year ended September 30, 2007

OPERATING REVENUE

Tenant Rental Revenue	\$ 655,507	
Tenant Revenue-Other	43,427	
HUD Grants	1,338,722	
Interest Income	32,095	
Other Income	<u>3,534</u>	
<u>Total Operating Revenue</u>		\$ 2,073,285

OPERATING EXPENSES

Administrative	\$ 545,243	
Tenant Services	11,115	
Utility Expenses	351,564	
Ordinary Maintenance	620,494	
General Expenses	127,397	
Housing Assistance Payments	291,927	
Casualty Losses	(2,205)	
Depreciation Expenses	<u>689,810</u>	
<u>Total Operating Expenses</u>		<u>2,635,345</u>
<u>Operating Income (Loss)</u>		\$ (562,060)

CAPITAL CONTRIBUTIONS 296,118

Changes in Net Assets \$ (265,942)

Total Net Assets- Beginning	\$ 6,420,860	
Prior Period Adjustment:		
Removal of prior year Compensated Absences accrual	<u>13,445</u>	<u>6,434,305</u>
 Total Net Assets- Ending		 \$ <u>6,168,363</u>

The Accompanying Notes are an Integral part of the Financial Statements

BENTON TWP HOUSING COMMISSION
Combined Statement of Cash Flows
For the Year Ended September 30, 2007

Business Type Activities

CASH FLOWS FROM OPERATING ACTIVITIES

Receipts from Customers	\$ 696,878
Payments to Suppliers	(1,639,217)
Payments to Employees	(489,801)
HUD Grants	1,338,722
Other Receipts (Payments)	<u>35,629</u>
Net Cash Provided (Used) by Operating Activities	\$ (57,789)

CASH FLOWS FROM CAPITAL AND
RELATED FINANCING ACTIVITIES

Contributed Capital	\$ 296,118
Purchases of Capital Assets	<u>(302,249)</u>
Net Cash Provided from (used) in Related Financing Activities	<u>(6,131)</u>
Net Increase (Decrease) in Cash and Cash Equivalents	\$ (63,920)
Balance- Beginning of Year	<u>402,660</u>
Balance- End of Year	\$ <u>338,740</u>

RECONCILIATION OF OPERATING INCOME (LOSS) TO NET
CASH PROVIDED (USED) BY OPERATING ACTIVITIES

Net Operating Profit or (Loss)	\$ (562,060)
Adjustments to Reconcile Operating Income to Net Cash Provided (Used) by Operating Activities:	
Depreciation	689,810
Changes in Assets (Increase) Decrease:	
Receivables (Gross)	(276,481)
Investments	51,178
Prepaid Expenses	9,694
Changes in Liabilities Increase (Decrease):	
Accounts Payable	5,277
Accrued Liabilities	21,348
Security Deposits	3,974
Deferred Revenue	<u>(529)</u>
Net Cash Provided by Operating Activities	\$ <u>(57,789)</u>

The Accompanying Notes are an Integral part of the Financial Statements

BENTON TWP HOUSING COMMISSION
Notes to Financial Statements
September 30, 2007

NOTE 1: Summary of Significant Accounting Policies

Reporting Entity-

Benton Twp. Housing Commission, Benton Harbor, Michigan, (Commission) was created by ordinance of Benton Township. The Commission signed and Annual Contributions Contract (ACC) with the U.S. Department of Housing and Urban Development (HUD). The ACC requires the Commission to provide safe, sanitary and decent housing for qualifying senior and low income families.

The Commission consists of the following:

MI 32-001	Low rent program	300 units
MI 32-V0 032-2, 3	Section 8 Vouchers	75 units

In determining the reporting entity, the manifestations of oversight, as defined by the Governmental Accounting Standards Board (GASB), Cod. sec 2100, were considered. The criteria include the following:

The nucleus of the financial reporting entity as defined by the Governmental Accounting Standards Board (GASB) Statement No. 14 is the "primary government". A fundamental characteristic of a primary government is that it is a fiscally independent entity. In evaluating how to define the financial reporting entity, management has considered all potential component units. A component unit is legally separate entity for which the primary government is financially accountable. The criterion of financial accountability are the ability of the primary government to impose its will upon the potential component unit. Based on the above, there are no component units.

These criteria were considered in determining the reporting entity.

Basis of Presentation-

The accounts of the Commission are organized by the Catalog of Federal Domestic Awards (CFDA) numbers, in the Financial Data Schedule; each of which is considered a separate accounting entity. The operations of each fund are accounted for with a separate set of self balancing accounts that comprise its assets, liabilities, net assets, revenues, and expenditures, or expenses, as appropriate. Commission resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled.

Notes to Financial Statements- continued

Proprietary Funds

Enterprise Funds- Enterprise Funds are used to account for operations (a) that are financed and operated in a manner similar to private business enterprises- where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, management control, accountability, or other purposes.

Basis of Accounting-

Basis of accounting refers to when revenues and expenditures or expenses are recognized in the accounts and reported in the financial statements. Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied.

Proprietary Funds are accounted for using the accrual basis of accounting. The revenues are recognized when they are earned, and their expenses are recognized when they are incurred.

Prior to October 1, 1998, the Commission followed a basis of accounting consistent with the cognizant agency, the U. S. Department of Housing and Urban Development, HUD. Those practices differed from Generally Accepted Accounting Principals (GAAP); however, for all fiscal years beginning on or after October 1, 1998, HUD has required adherence to GAAP. Therefore, the current and future financial presentations will follow GAAP and the Financial Accounting Standards Board (FASB) pronouncements issued subsequent to November 30, 1989, provided they do not conflict with Governmental Accounting Standards Board (GASB) pronouncements.

Use of estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosures of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from these estimates.

Budgetary data-

Formal budgetary integration is employed as a management control device during the year in proprietary type funds. Budgets for funds are adopted on a basis consistent with generally accepted accounting principles (GAAP) for that fund type. The Commission adopts a budget annually, and amends the budgets as it feels necessary in order to maintain financial integrity.

Notes to Financial Statements- continued

Assets, Liabilities, and Net Assets-

Deposits & Investments

Deposits are stated at cost; the carrying amount of deposits is separately displayed on the balance sheet as cash and cash equivalents; investments are stated at cost which approximates market.

Cash Equivalents

Cash Equivalents represent investments purchased with a three month maturity or less; investments meeting this criteria are reclassified for financial statement purposes as cash.

Fixed Assets

Fixed assets are recorded at historical cost, depreciated over their useful lives using the straight line method of depreciation. Fixed assets are reported as fund equity; Invested in Capital Assets, Net of Related Debt.

Depreciation of all exhaustible fixed assets used by proprietary funds is charged as an expense against their operations; depreciation has been provided over the estimated useful lives using the straight line method. The estimated useful lives are as follows:

Buildings and Improvements	40 years
Equipment	3-10 years

Compensated Absences

Sick leave and other compensated absences with similar characteristics have been accrued as a liability. The amount accrued was based on the probability that the Commission will compensate the employees for the benefits through cash payments as a condition of the employees' termination or retirement.

Note 2: Cash and Investments.

The composition of cash and investments are as follows:

Cash:

Checking Accounts	\$ 185,909
Savings Accounts	152,531
Petty Cash	<u>300</u>
Financial Statement Total	\$ <u>338,740</u>

Investments:

Certificates of Deposit	\$ <u>329,984</u>
-------------------------	-------------------

Notes to Financial Statements- continued

Generally the Commission classifies cash and investments with the following risk assumptions:

- 1) Insured or registered in the Commission's name.
- 2) Uninsured or unregistered, held by a broker in the Commission's name.
- 3) Uninsured or unregistered, held by a broker not in the Commission's name.

	Categories			Carrying	Market
	1	2	3	Amount	Value
Cash:					
Checking A/C's	\$ 185,909	\$	\$	\$ 185,909	\$ 185,909
Petty Cash	300			300	300
Savings Accounts	<u>152,531</u>			<u>152,531</u>	<u>152,531</u>
Total Cash	\$ <u>338,740</u>	\$	\$	\$ <u>338,740</u>	\$ <u>338,740</u>
Investments:					
C/D's	\$ <u>329,984</u>	\$	\$	\$ <u>329,984</u>	\$ <u>329,984</u>

All investments are covered by either FDIC or bank collateralization commitment letters.

Note 3: Accounts Receivable

Accounts Receivable consist of the following:

Accounts Receivable	\$ 4,671	
Allowance for Doubtful Accounts	<u>(1,406)</u>	\$ 3,265
Account Receivable-Family Investment Center	\$ 47,835	
Accounts Receivable- HUD	309,540	
Accrued Interest Receivable	<u>4,615</u>	<u>361,990</u>
Accounts Receivable, net		\$ <u>365,255</u>

Note 4: Fixed Asset Analysis.

The following represents the changes in fixed assets for the year:

	Beginning of Year	Additions	Deletions	End of Year
Land	\$ 250,681	\$	\$	\$ 250,681
Buildings & Improvement	12,978,647	202,318		13,180,965
Furniture & Equipment-Dwellings	441,820		192,486	249,334
Furniture & Equipment-Admin	325,840	40,738	44,290	322,288
Construction in Progress	<u>0</u>	<u>59,193</u>		<u>59,193</u>
	\$13,996,988	\$ 302,249	\$ 236,776	\$14,062,461
Less Accumulated Depreciation	<u>8,382,431</u>	<u>689,810</u>	<u>236,776</u>	<u>8,835,465</u>
	\$ <u>5,614,557</u>	\$ <u>(387,561)</u>	\$	\$ <u>5,226,996</u>

Notes to Financial Statements- continued

Note 5: Accrued Liabilities

Accrued Liabilities consist of the following:

Accrued Wages & Benefits	\$ 10,119
Accrued Utilities Payable	<u>33,831</u>
Financial Statement Total	<u>\$ 43,950</u>

Note 6: Pension Plan

The Commission has a Defined Contribution Pension Plan (Plan) for governmental employees. The Plan allows for early retirement (age 55), normal retirement (age 65), employer contributions (10% of compensation), mandatory after-tax employee contributions (5% of compensation), and voluntary after tax employee contributions (1-10% of compensation). In addition to the above, no age requirements exist for eligibility, and 100% vesting is immediate. Plan assets and funding statistics are available under separate cover provided to the Commission by the Insurer.

Note 7: Reclassifications.

Certain prior years' balances have been reclassified to conform to the current year's presentation.

Note 8: Risk Management

The Commission is exposed to various risks of loss related to property loss, torts, error and omissions and employee injuries. The Commission purchases commercial insurance to cover the risks of these losses. The Commission had the following insurance in effect during the year:

<u>Types of Policies</u>	<u>Coverage's</u>
Property	\$ 21,583,000
General Liability	1,000,000
Dishonesty Bond	1,000,000
Automobile Liability	300,000
Worker's Compensation and other riders: minimum coverage's required by the State of Michigan	

Note 9: Combining Financial Data Schedules.

The totals in the Combining Balance Sheet and Combining Income Statement represent unconsolidated totals. Under principals of consolidation, inter fund transactions would be eliminated; the totals in the combined statements follow the financial data schedule format recommended by the U.S. Department of Housing and Urban Development's Real Estate Assessment Center (REAC).

Benton Twp Housing Commission

30-Sep-07

MI032

Combining Balance Sheet		Low Rent 14.850	Section 8 Housing Choice Voucher Program 14.871	Capital Projects Funds 14.872	TOTAL
Line Item #					
	ASSETS:				
	CURRENT ASSETS:				
	Cash:				
111	Cash - unrestricted	229,947	44,687	-	274,634
112	Cash - restricted - modernization and developmen	-			-
113	Cash - other restricted				-
114	Cash - tenant security deposits	64,106			64,106
100	Total cash	294,053	44,687	-	338,740
	Accounts and notes receivables:				
121	Accounts receivable - PHA projects	-	-		-
122	Accounts receivable - HUD other projects	100,447	-	209,093	309,540
124	Accounts receivable - other government				-
125	Accounts receivable - miscellaneous	47,835	-		47,835
126	Accounts receivable- tenants - dwelling rents	4,671			4,671
126.1	Allowance for doubtful accounts - dwelling rents	(1,406)			(1,406)
126.2	Allowance for doubtful accounts - other				-
128	Fraud recovery	-			-
128.1	Allowance for doubtful accounts - fraud	-			-
129	Accrued interest receivable	4,615			4,615
120	Total receivables, net of allowances for doubtful accou	156,162	-	209,093	365,255
	Current investments				-
131	Investments - unrestricted	329,984			329,984
132	Investments - restricted	-			-
142	Prepaid expenses and other assets	70,298			70,298
143	Inventories				-
143.1	Allowance for obsolete inventories				-
144	Interprogram - due from	209,093	123,495	-	332,588
146	Amounts to be provided				-
150	TOTAL CURRENT ASSETS	1,059,590	168,182	209,093	1,436,865
	NONCURRENT ASSETS:				
	Fixed assets:				
161	Land	230,681	20,000		250,681
162	Buildings	5,024,388			5,024,388
163	Furniture, equipment & machinery - dwellings	225,996	-	23,338	249,334
164	Furniture, equipment & machinery - admininstrator	280,060	-	42,228	322,288
165	Building Improvements	7,731,134		425,443	8,156,577
167	Construction in Progress			59,193	59,193
166	Accumulated depreciation	(8,805,357)	-	(30,108)	(8,835,465)
160	Total fixed assets, net of accumulated depreciation	4,686,902	20,000	520,094	5,226,996
171	Notes and mortgages receivable - non-curren				-
172	Notes and mortgages receivable-non-current-past due				-
174	Other assets				-
175	Undistributed debits				-
176	Investment in joint ventures				-
180	TOTAL NONCURRENT ASSETS	4,686,902	20,000	520,094	5,226,996
190	TOTAL ASSETS	5,746,492	188,182	729,187	6,663,861

	LIABILITIES AND EQUITY:				
	LIABILITIES:				
	CURRENT LIABILITIES				
311	Bank overdraft				-
312	Accounts payable ≤ 90 days	22,655	280		22,935
313	Accounts payable > 90 days past due				-
321	Accrued wage/payroll taxes payable	10,119	-		10,119
322	Accrued compensated absences	-			-
324	Accrued contingency liability				-
325	Accrued interest payable				-
331	Accounts payable - HUD PHA programs		-		-
332	Accounts Payable - PHA Projects		-		-
333	Accounts payable - other government	29,567	-	-	29,567
341	Tenant security deposits	64,106			64,106
342	Deferred revenues	2,352	-		2,352
343	Current portion of Long-Term debt - capital projects				-
344	Current portion of Long-Term debt - operating borrowings				-
345	Other current liabilities	33,831			33,831
346	Accrued liabilities - other	-			-
347	Inter-program - due to	123,495	-	209,093	332,588
310	TOTAL CURRENT LIABILITIES	286,125	280	209,093	495,498
	NONCURRENT LIABILITIES:				
351	Long-term debt, net of current- capital projects				-
352	Long-term debt, net of current- operating borrowings				-
353	Noncurrent liabilities- other	-			-
354	Accr. Comp. Absences- non current	-			-
350	TOTAL NONCURRENT LIABILITIES	-	-	-	-
300	TOTAL LIABILITIES	286,125	280	209,093	495,498
	EQUITY:				
501	Investment in general fixed assets				-
	Contributed Capital:				
502	Project notes (HUD)	-			-
503	Long-term debt - HUD guaranteed	-			-
504	Net HUD PHA contributions	-			-
505	Other HUD contributions				-
507	Other contributions	-			-
508	Total Contributed Capital	-	-	-	-
508.1	Invested in Capital Assets, Net of Related Debt	4,686,902	20,000	520,094	5,226,996
	Reserved fund balance:				
509	Reserved for operating activities				-
510	Reserved for capital activities				-
511	Total reserved fund balance	-	-	-	-
512	Undesignated fund balance/retained earnings	-	-	-	-
512.1	Unrestricted Net Assets	773,465	167,902	-	941,367
513	TOTAL EQUITY	5,460,367	187,902	520,094	6,168,363
600	TOTAL LIABILITIES AND EQUITY	5,746,492	188,182	729,187	6,663,861

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Benton Twp Housing Commission

30-Sep-07

MI032

		Low Rent 14.850	Housing Choice Voucher Program 14.871	Capital Projects Funds 14.872	TOTAL
Combining Income Statement					
Line Item #				-	
	REVENUE:	-	-		
703	Net tenant rental revenue	655,507			655,507
704	Tenant revenue - other	43,427			43,427
705	Total tenant revenue	698,934	-	-	698,934
706	HUD PHA grants	815,762	403,569	415,509	1,634,840
708	Other government grants				-
711	Investment income - unrestricted	31,879	216	-	32,095
712	Mortgage interest income				-
714	Fraud recovery		629		629
715	Other revenue	3,065	(160)	-	2,905
716	Gain or loss on the sale of fixed assets	-			-
720	Investment income - restricted				-
700	TOTAL REVENUE	1,549,640	404,254	415,509	2,369,403
	EXPENSES:				
	Administrative				
911	Administrative salaries	238,137	25,250	22,000	285,387
912	Auditing fees	6,600	-		6,600
913	Outside management fees				-
914	Compensated absences	-			-
915	Employee benefit contributions- administrative	109,838	4,750	8,938	123,526
916	Other operating- administrative	114,052	4,736	10,942	129,730
	Tenant services				
921	Tenant services - salaries				-
922	Relocation costs	-			-
923	Employee benefit contributions- tenant services				-
924	Tenant services - other	1,328		9,787	11,115
	Utilities				
931	Water	156,687			156,687
932	Electricity	111,676			111,676
933	Gas	83,201			83,201
934	Fuel				-
935	Labor				-
937	Employee benefit contributions- utilities				-
938	Other utilities expense	-			-
	Ordinary maintenance & operation				
941	Ordinary maintenance and operations - labor	194,414		10,000	204,414
942	Ordinary maintenance and operations - materials & contract costs	76,973		-	76,973
943	Ordinary maintenance and operations - contract costs	191,515		53,663	245,178
945	Employee benefit contributions- ordinary maintenance	89,867		4,062	93,929
	Protective services				

[illegible]

BENTON TWP HOUSING COMMISSION
Schedule of Annual Federal Awards
For the Year Ended September 30, 2007

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Direct Programs:

	<u>Annual Program Expenditures</u>
* <u>CFDA 14.850 Public and Indian Housing</u>	
C-3029 Operating Subsidies	\$ <u>815,762</u>
* <u>CFDA 14.871 Housing Assistance Programs</u>	
C-3099V Section 8 Housing Choice Vouchers	\$ <u>403,569</u>
* <u>CFDA 14.872 Capital Projects Funds</u>	
C-3029 Capital Projects Grants	\$ <u>415,509</u>
	\$ <u>1,634,840</u>

*Connotes Major Program Category

Significant Account Policies

The accounting policies of the Commission conform to generally accepted accounting principles as applicable to governmental proprietary funds. The financial statements contained in the Commission's annual audit report are prepared on the accrual basis of accounting; revenues are recognized when earned, expenses are recorded when the related services or product are received.

BENTON TWP HOUSING COMMISSION
Status of Prior Audit Findings
September 30, 2007

The prior audit of the Benton Twp Housing Commission for the period ended September 30, 2006, contained one audit finding; the corrective action taken by the Commission is as follows:

- 1) Tenant Accounting Discrepancies- Section 8 Vouchers; The areas of concern mentioned in last years audit have been addressed satisfactorily.

BENTON TWP HOUSING COMMISSION
Report on Compliance and on Internal Control over
Financial Reporting Based on an Audit of Financial
Statements Performed in Accordance with
Government Auditing Standards
September 30, 2007

I have audited the financial statements of the Benton Twp Housing Commission of Benton Harbor, Michigan, as of and for the year ended September 30, 2007, and have issued my report thereon dated May 21, 2008. I conducted my audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

In planning and performing my audit, I considered the Commission's internal control over financial reporting as a basis for designing my auditing procedures for the purpose of expressing my opinion on the financial statements, but not for the purpose of expressing my opinion on the effectiveness of the Commission's internal control over financial reporting. Accordingly, I do not express an opinion on the effectiveness of the Benton Twp Housing Commission's internal control over financial reporting.

A *control deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A *significant deficiency* is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control.

A *material weakness* is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control. I did not consider any of the deficiencies described in the accompanying schedule of findings and questioned costs to be material weaknesses.

My consideration of the internal control over compliance was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. I did not identify any deficiencies in internal control over financial reporting that I consider to be a material weaknesses, as defined above.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Commission's financial statements are free of material misstatement, I performed tests of its compliance with certain provisions of laws, regulations, contracts, and grants, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of my audit, and accordingly, I do not express such an opinion. The results of my tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*, and which are described in the accompanying schedule of findings and questioned costs.

This report is intended solely for the information of management, Board of Commissioners, and federal awarding agencies and is not intended to be and should not be used by anyone other than those specified parties.

Certified Public Accountant
Hemlock, Michigan
May 21, 2008

BENTON TWP HOUSING COMMISSION
Report on Compliance with Requirements Applicable
to Each Major Program and on Internal Control over Compliance in
Accordance with OMB Circular A-133
September 30, 2007

Compliance

I have audited the compliance of the Benton Twp Housing Commission of Benton Harbor, Michigan, with the types of compliance requirements described in the *U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement* that are applicable to each of its major federal programs for the year ended September 30, 2007. The Commission's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the Commission's management. My responsibility is to express an opinion on the Commission's compliance based on my audit.

I conducted my audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that I plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Commission's compliance with those requirements and performing such other procedures as I considered necessary in the circumstances. I believe that my audit provides a reasonable basis for my opinion. My audit does not provide a legal determination on the Commission's compliance with those requirements.

In my opinion, except as noted below, the Commission complied, in all material respects, with the requirements referred to above that are applicable to each of its major federal programs for the year ended September 30, 2007. However, the results of my auditing procedures disclosed instances of noncompliance with those requirements, which are required to be reported in accordance with OMB Circular A-133 and which are described in the accompanying schedule of findings and questioned costs:

<u>Finding</u>	<u>Audit Number</u>	<u>Compliance Requirements</u>
Capital Fund Program:		
Davis Bacon Act Discrepancies	07-1	Davis Bacon

The management of the Commission is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts, and grants applicable to federal programs. In planning and performing my audit, I considered the Commission's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine my auditing procedures for the purpose of expressing my opinion on the effectiveness of internal control over compliance. Accordingly, I do not express an opinion on the effectiveness of the Commission's internal control over compliance.

My consideration of the internal control over compliance was for the limited purpose described in the preceding paragraph of this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. However, as discussed below, I identified certain deficiencies in internal control over compliance that I consider to be significant deficiencies.

A *control deficiency* in an entity's internal control over compliance exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect noncompliance with a type of compliance requirement of a federal program on a timely basis. A *significant deficiency* is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to administer a federal program such that there is more than a remote likelihood that non-compliance with a type of compliance requirement of a federal program that is more than inconsequential will not be prevented or detected by the entity's internal control. I considered the deficiencies in internal control over compliance as described above.

A *material weakness* is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that material non-compliance with a type of compliance requirement of a federal program will not be prevented or detected by the entity's internal control. I did not consider any of the deficiencies described in the accompanying schedule of findings and questioned costs to be material weaknesses.

Benton Twp Housing Commission's response to the findings identified in my audit are described in the accompanying schedule of findings and question costs. I did not audit Benton Twp Housing Commission's response and, accordingly, I express no opinion on it.

This report is intended solely for the information and use of, management, Board of Commissioners, and federal awarding agencies and is not intended to be and should not be used by anyone other than those specified parties.

Certified Public Accountant
Hemlock, Michigan
May 21, 2008

Schedule of Findings and Questioned Cost
September 30, 2007

1) Summary of Auditor's Results:

Programs:

	<u>Major Program</u>	<u>Non Major Program</u>
Low income Public Housing	X	
Section 8 Housing Choice Vouchers	X	
Capital Projects Funds	X	

Opinions:

Financial Statements-

Unqualified

Material weakness(es) noted _____ Yes X No

Control Deficiency (ies) noted _____ Yes X No

Non Compliance material to financial statements noted _____ Yes X No

Report on compliance for Federal programs-

Unqualified

Material weakness(es) noted _____ Yes X No

Control Deficiency (ies) noted X Yes _____ No

Non Compliance material to financial statements noted _____ Yes X No

Thresholds:

Dollar limit used to determine type A & B programs- \$ 300,000

The Auditee did qualify as a low risk auditee.

<u>Name of Federal Program</u>	<u>Major Program</u>	<u>Questioned Costs</u>	<u>Audit Finding Number</u>
Low Rent Public Housing	Yes	None	N/A
Section 8 Vouchers	Yes	None	N/A
Capital Fund Project	Yes	None	7-1

Schedule of Findings & Questioned Cost
September 30, 2007

The following finding of the Benton Twp Housing Commission, for the year ended September 30, 2007, was discussed with the Executive Director, Ms. Sharon Hester, in an exit interview conducted April 3, 2008.

Finding 07-1:

Criteria-

The Commission must follow HUD regulations concerning Davis Bacon Act requirements.

Condition-

The Commission did not retain certified payrolls for the contractor's employees; no employee interviews or comparison to the Davis Bacon wage determination was conducted.

Questioned Cost-

None

Effect-

The Commission has not followed prescribed HUD procedures concerning Davis Bacon Act requirements.

Cause-

Davis Bacon Act Discrepancies.

Recommendation

The Davis Bacon Act requires the Commission retain certified payrolls of all contractor wages. The Act does not require employee interviews if other comparisons of certified payrolls are conducted; without the certified payrolls, the comparison could not be made.

In the future, I recommend the Commission obtain certified payrolls and compare the hourly rates to the wage determination to insure compliance.

Reply

In the future the Benton Township Housing Commission will interview the employees for their hourly rate, compare the rate to the certified payrolls and the hourly rates to the wage determination to insure compliance.